

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE NO. 05-10019-RGS
	)	
DANIEL W. McELROY and	)	
AIMEE J. KING McELROY	)	
_____	)	

**DEFENDANTS' DANIEL McELROY AND AIMEE KING McELROY'S REQUESTED  
QUESTIONS FOR VOIR DIRE EXAMINATION**

1. State your full name, date of birth, and city of residence.
2. Where do you work, or if unemployed or retired, where did you work
3. How long have you worked at your current job
4. Describe your job duties or responsibilities.
5. Have you ever been responsible for hiring, firing or supervising employees
6. How far did you go in school?
7. What is your marital status?
8. If married, for how long?
9. If your married or living with someone, where does this person work?
10. What are the sexes, ages and occupations of your children?
11. Have you had any training or courses in any of the following areas: accounting, business, taxes, insurance, business management, criminal law, finance, information or computer systems or law enforcement? If yes, what training or courses
12. Have you or any family members or friend ever been employed by or applied for a job with any law enforcement agency? If yes, who and what agency?

13. Do you know anyone who works in the United States Attorney's Office, the United States States Department of Justice, the FBI, the Internal Revenue Service, any District Attorney's office or local police department? If yes, whom do you know?
14. Have you ever contacted the United Attorney's Office, the United States Department of Justice, the FBI, the Internal Revenue Service. If yes, what was the reason
15. If a law enforcement officer and a defendant or witness for a defendant in a criminal case give conflicting versions of the same event, would you be more inclined to believe the version given by the law enforcement officer? If yes, please explain.
16. Have you ever been a plaintiff or defendant in a law suit? If yes, please explain, including what type of case, the outcome and how you felt about the outcome.
17. Have you, a family member or friend ever worked for a temporary employment agency? If yes, did you, your friend or family member have a positive or negative experience with the temporary employment agency
18. Have you, a family member or a friend ever been employed by Daily A. King, Pro-Temp, Precision Temp Corp, B.J.'s Service Company, Advanced Temporary Services, Inc.? If your answer is yes, please explain.
19. Have you, any family member or a friend ever worked for any law enforcement agency? If yes, who and for what agency?
20. Have you or any one else you know ever been accused of doing something that you did not do? If yes, please explain.
21. Have you or any one you know ever been a victim of a crime?
22. If yes, what type of crimes?
23. Who was the victim?
24. Was any one arrested?
25. What was the outcome of the proceeding?
26. How did you feel about the outcome?
27. Have you or family member or friend ever been examined or audited by the Internal Revenue Service?
28. If yes, describe your experience with the Internal Revenue Service.

29. If a defendant in a criminal case did not take the stand to testify in his or her own behalf, would you consider his or her failure to testify as some evidence of guilt.
30. Do you have any feelings or do you believe right now that either Aimee McElroy or Dan McElroy broke any laws or did anything illegal?
31. If yes, please explain.
32. Other than a traffic ticket, have you or any family member ever been arrested, charged or convicted of a crime.
33. If yes, please explain.
34. Have you, or any family member ever been employed by any insurance company, including but not limited to Liberty Mutual Insurance, Group, American Policy Holders Insurance Company, AIM Mutual Insurance Company, Grant State Insurance Company, American Home Assurance Company, Reliance National Indemnity Company, Gulf Insurance Company?
35. If yes, please explain.
36. Have you or any family member been insured by any of these companies?
37. There is an allegation that some or all of these companies were defrauded by Aimee McElroy and Dan McElroy. Does that allegation affect you in any way about being a fair and impartial juror in this case?
38. To the best of your knowledge have you or a family member or close friend had a bad experience with an insurance company? If yes please explain.
39. Have you or any family member ever owned their own business?
40. If yes, who and what type of business?
41. If the business is no longer open, why was it sold or closed?
42. Have you ever experienced a financial loss that was the result of fraud or embezzlement? If yes, please explain.
43. Please list the newspapers, magazines to which you subscribe or regularly read.
44. Please describe any civic, political, social, professional or religious organizations to which you now belong or have belonged.

45. Is there any reason why you would be unwilling or unable to serve as a juror in this case where the government is accusing Aimee McElroy and Dan McElroy of committing the crimes of conspiracy, mail fraud and tax fraud?

46. Do you have any feelings about these criminal charges that would in any way hinder or prevent you from being a fair and impartial juror.

47. If you are chosen to serve on this jury, will your employer continue to pay you?

48. Do you have any specific problems at home or on the job that might make it difficult for you to give your full attention to this trial?

49. Is there anything you would like to discuss privately with the court?

50. Is there anything else you feel the parties should know about you?

Respectfully submitted:

**AIMEE J. McELROY**

By her attorney,



Jack I. Zalkind (BBO# 538840)

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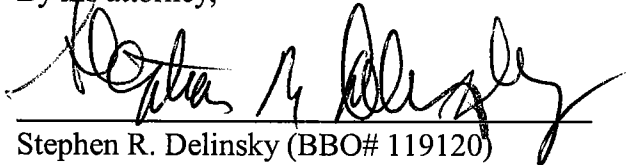
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DATED: January 11, 2008

Respectfully submitted

**DANIEL McELROY,**

By his attorney,



Stephen R. Delinsky (BBO# 119120)

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**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on 1-11-08

By: 